

IN THE UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF MISSOURI

In Re:)
)
Blanche M. Lias)
Debtor) Case No 19-50510

**DEBTOR'S OBJECTION TO U.S. BANK NATIONAL ASSOCIATION'S
NOTICE OF MORTGAGE PAYMENT CHANGE**

Comes now debtor and for her Objection to U.S. Bank National Association's Notice of Mortgage Payment Change, Document No. 81, states as follows:

1. Creditor U.S. Bank filed a Notice of Mortgage Payment Change regarding Claim #7 stating that there was an escrow shortage causing a \$331.82 increase in debtor's mortgage payment.
2. Due to the drastic increase, debtor contacted her homeowner's insurance company and was told due to error her yearly policy increased by several thousand dollars.
3. Debtor changed from USAA insurance to Buchanan County Mutual which is approximately \$4,600.00 less annually than USAA.
4. U.S . Bank Association is the servicer of debtor's mortgage with Rushmore Loan Management Services, LLC. Debtor received a letter from Rushmore Loan Management Services stating that they are in receipt of her new policy which replaced the other policy but has not received any correspondence decreasing the escrow/monthly mortgage payment.
5. Debtor requests the mortgage company complete an escrow analysis based on her current mortgage premium which should create a decreased mortgage payment rather than an increase.
6. The mistake made by debtor's previous insurance company and the increased payment listed in U.S. Bank's Notice of Mortgage Payment Change causes debtor's plan to run long and would cause an unaffordable increase in debtor's Plan payment.

WHEREFORE, debtor prays the Court deny the Notice of Mortgage Payment Change regarding Claim #7 and order U.S. Bank to complete a mortgage analysis based on debtor's current homeowners' policy with Buchanan County Mutual Insurance; and for such other and further orders as the Court may deem just and proper.

/s/ Noah J. Briles

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ATTORNEY FOR DEBTOR

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of August, 2022 the above Objection was filed electronically using CM/ECF and a true and correct copy of the Objection was sent to Creditor's counsel and all parties requesting electronic notice and to the Office of the United States Trustee via email at ustpregion13.kc.ecf@usdogj.gov and to:

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/s/ Noah J. Briles

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